UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NORTH CAROLINA CHARLOTTE DIVISION

DOCKET NO.: 3:24-cv-01002

| SALLAMONDRA ROBINSON, | | |
|----------------------------------|----|---|
| INDIVIDUALLY AND AS | | |
| PERSONAL REPRESENTATIVE OF | | |
| THE ESTATE OF SHANQUELLA ROBINSO | N, | |
| DECEASED. |) | |
| Plaintiff, | | , |
| v. |) | |
| EN ANY ORDERY | |) |
| E'MANI GREEN, |) | |
| ALYSSE HYATT, |) | |
| MALIK DYER, |) | |
| WENTER DONOVAN, |) | |
| KHALIL COOKE, |) | |
| NAZEER TYREE WIGGINS, | | |
| UNITED STATES DEPARTMENT OF |) | |
| STATE, AND THE |) | |
| FEDERAL BUREAU OF INVESTIGATION, |) | |
| |) | |
| Defendants. | | |
| | / | 1 |

PLAINTIFF'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANT'S UNITED STATES DEPARTMENT OF STATE AND THE FEDERAL BUREAU OF INVESTIGATION MOTION TO DISMISS

Plaintiff, SALLAMONDRA ROBINSON, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE ESTATE OF SHANQUELLA ROBINSON, DECEASED, by and through her undersigned counsel, hereby respectfully requests this Honorable Court for an Extension of Time to Respond to Defendant's United States Department of State and The Federal Bureau of Investigation Motion to Dismiss through *March 10, 2025* and states as follows:

- 1. On January 21, 2025, Defendant's counsel United States Department of State and The Federal Bureau of Investigation filed a Motion to Dismiss {D.E.26}.
- 2. Plaintiff's Counsel was in trial until February 7, 2025.

3. Plaintiff's counsel requests a 30-day extension to respond to Defendant's United States

Department of State and The Federal Bureau of Investigation Motion to Dismiss.

4. The undersigned counsel seeks this extension in good faith and there will be no

prejudice to the Defendants.

5. Plaintiff's counsel conferred with the Defendants counsel, Gill Beck, who did not object to the

motion.

WHEREFORE, Plaintiff, SALLAMONDRA ROBINSON, INDIVIDUALLY AND AS PERSONAL

REPRESENTATIVE OF THE ESTATE OF SHANQUELLA ROBINSON, DECEASED, respectfully

requests this Court grant a thirty (30) day extension of time to Motion to Dismiss, and all other relief this

Court deems just and proper.

CERTIFICATE OF GOOD FAITH CONFERENCE

Undersigned Counsel certifies that the undersigned has conferred with Counsel for Defense, who did not

oppose the relief sought herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 7, 2025, a true and correct copy of the

foregoing was furnished via electronic mail to all of attorneys of records through the CM ECF

portal.

Respectfully submitted,

Sue-Ann Robinson, Esq.

/s/ Sue-Ann Robinson

Attorney for Plaintiff

614 S. Federal Highway

Fort Lauderdale, FL 33301

Tel.: (754) 801-0897

Email: sueann@frontlinefirm.com

Fla. Bar No.: 29463